

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civ. No. 1:24-cv-1288

2020 CHEVROLET CAMARO

VIN: 1G1FC3DS0L0146412,

Defendant-in-rem.

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Plaintiff, United States of America, brings this complaint in accordance with Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

**NATURE OF THE ACTION**

1. This is a civil action to forfeit and condemn to the use and benefit of the United States of America property involved in violations of the Controlled Substances Act that is subject to forfeiture pursuant to 21 U.S.C. §§ 881(a)(6) and 881(a)(4).

**DEFENDANT *IN REM***

2. The Defendant *in rem* consists of the following:

2020 CHEVROLET CAMARO BEARING VEHICLE IDENTIFICATION NUMBER (VIN):  
1G1FC3DS0L0146412

(hereinafter referred to as “Defendant Conveyance”).

3. The Defendant Conveyance was seized by the Federal Bureau of Investigation (FBI) on or about July 24, 2024, in the District of New Mexico.

4. The Defendant Conveyance is now, and during the pendency of this action will be, in the jurisdiction of this Court.

**JURISDICTION AND VENUE**

5. The United States District Court for the District of New Mexico has subject matter jurisdiction under 28 U.S.C. §§ 1345, 1355(a) and 1356.

6. Venue for this civil forfeiture action is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395, as acts or omissions giving rise to the forfeiture took place in this district and the property is found in this district. Upon the filing of this complaint, the Defendant Conveyance will be arrested by execution of a Warrant for Arrest *In Rem* in the District of New Mexico.

**FACTS**

7. On July 24, 2024, a search warrant was executed at 2200 Holiday Ave Space #110, Las Cruces, New Mexico. Agents located distribution quantities of cocaine and methamphetamine in the residence. The Defendant 2020 Chevrolet Camaro VIN 1G1FC3DS0L0L46412 was seized during the search. The registered owner of the 2020 Chevrolet Camaro is Raul Andrews Alvarado (Alvarado).

8. Agents interviewed Alvarado after the search execution. Alvarado advised that the cocaine and methamphetamine located in the residence belonged to him and that he sold both cocaine and methamphetamine.

9. Alvarado further advised that the 2020 Chevrolet Camaro parked in front of the residence belonged to him and that he purchased the vehicle in full with cash. He stated that the cash he had used to purchase the vehicle was proceeds from selling drugs.

10. On two separate occasions agents conducted a controlled purchase of cocaine from Alvarado while he was in the 2020 Chevrolet Camaro.

**FIRST CLAIM FOR RELIEF**

11. The United States incorporates by reference the allegations in paragraphs 1 through 10 as though fully set forth herein.

12. Title 21, United States Code, Section 881(a)(4) subjects to forfeiture “[a]ll conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner facilitate the transportation, sale, receipt, possession, or concealment of property described in paragraph (1), (2), or (9) [*i.e.*, controlled substances, listed chemicals and related property].”

13. Defendant Conveyance was used and/or intended to be used to transport or to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances or listed chemical in violation of the Controlled Substances Act.

**SECOND CLAIM FOR RELIEF**

14. The United States incorporates by reference the allegations in paragraphs 1 through 10 as though fully set forth herein.

15. Title 21, United States Code, Section 881(a)(6) subjects to forfeiture “[a]ll moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.”

16. Defendant Conveyance was furnished or intended to be furnished in exchange for a controlled substance or listed chemical in violation of the Controlled Substances Act.

17. Defendant Conveyance constitutes proceeds traceable to an exchange of a controlled substance or listed chemical for moneys, negotiable instruments, securities, or other things of value in violation of the Controlled Substances Act.

WHEREFORE, Plaintiff seeks arrest of Defendant Conveyance and forfeiture of same to Plaintiff, determination of the validity and priority of claims of the Claimants and any Unknown

claimants to the Defendant Conveyance, costs and expenses of seizure and of this proceeding, and other proper relief.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ  
United States Attorney

*Filed Electronically December 23, 2024*

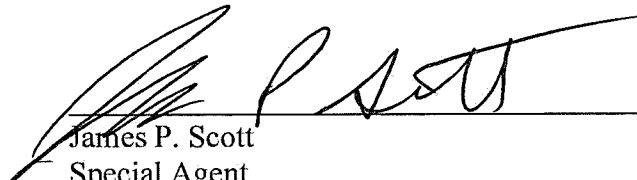
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**28 U.S.C. § 1746 DECLARATION**

I am a Special Agent with the Federal Bureau of Investigation who has read the contents of the Complaint for Forfeiture *In Rem* to which this Declaration is attached and the statements contained in the complaint are true to the best of my knowledge and belief.

I declare under penalty of perjury and the laws of the United States of America that this Declaration is true and correct, except as to matters stated on information and belief, and as to those matters, I believe them to be true.

Dated: 12/20/24

  
James P. Scott  
Special Agent  
Federal Bureau of Investigation